



August 9, 2018

**VIA ECF**

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Kaloyeros, et al.*, S2 16 Cr. 776 (VEC)**

Dear Judge Caproni:

As you of course know, we represent Steven Aiello in the above matter. At the close of the government's case, the Court reserved decision on Mr. Aiello's motion for a judgment of acquittal on all counts against Mr. Aiello under Federal Rule of Criminal Procedure 29(a). Pursuant to Rule 29(c), Mr. Aiello renews his motion for a judgment of acquittal, because the evidence was insufficient to establish beyond a reasonable doubt the elements of the offenses charged against him, and because the government failed to establish venue in the Southern District of New York by a preponderance of the evidence. Mr. Aiello also joins his co-defendants' motions to dismiss, to the extent relevant to him.

Thank you for your attention to this matter.

Very truly yours,

O'CONNELL AND ARONOWITZ

By:

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cc: All parties via ECF

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